Postal Regulatory Commission Submitted 9/27/2013 4:11:16 PM Filing ID: 87968 Accepted 9/27/2013

## BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL
PRIORITY MAIL CONTRACT 27

Docket No. MC2010-32

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 27 (MC2010-32)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2010-77

## MOTION OF THE UNITED STATES POSTAL SERVICE FOR TEMPORARY RELIEF

(September 27, 2013)

In Order No. 1796, issued August 1, 2013, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until October 5, 2013. The Postal Service and the customer have been working diligently to reach a new agreement over the past two months, to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. The Postal Service and the customer have now signed a successor contract, and the Postal Service will be filing the new agreement with the Commission early next week. However, because of the timing of the regulatory process, there will be a gap between the expiration of the existing contract and the effective date of the successor contract. Thus, the customer continues to face the prospect of an interruption in its access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional extension to allow the existing contract to remain in effect until such

2

time as the Commission is able to complete its review of the new agreement. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive product list under the successor agreement has been approved by the Commission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Pricing and Product Support

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3179, Fax -6187 elizabeth.a.reed@usps.gov
September 27, 2013